

1 The Honorable Benjamin H. Settle
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7 **UNITED STATES DISTRICT COURT**
8 **WESTERN DISTRICT OF WASHINGTON**
9 **AT TACOMA**

10 STANLEY PACE, an individual,

11 Plaintiff,

12 v.

13 JORAN LUNDH, an individual,

14 Defendant.

Case No. 3:18-cv-05965-BHS

**DECLARATION OF DEREK LINKE IN
SUPPORT OF PLAINTIFF STANLEY
PACE'S STATUS REPORT**

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16 I, Derek Linke, declare as follows:

17 1. I am counsel of record for Plaintiff Stanley Pace in this matter, over the age of 18, and
18 competent to testify to the matters stated herein.

19 2. Within days of the Court's Order denying Pace's motion for default judgment (Dkt.
20 No. 14), Defendant Joran Lundh forwarded a copy of the order to Uniregistry, the domain-name
21 registrar responsible for maintaining Pace's registration of the domain name which is at issue in
22 this action, lascal.com ("Domain Name"), asking for Uniregistry to transfer the Domain Name
23 to him. Attached as **Exhibit A** is a true and correct copy of the email correspondence I received
24 from Uniregistry's counsel on March 9, 2020, forwarding Lundh's March 7, 2020
25 communication with Uniregistry.

26 3. Uniregistry's counsel stated that, under the circumstances, the Domain Name's
27 status would remain unchanged. Uniregistry also advised that Lundh's correspondence
28 "demonstrates, among other things, (a) that [Lundh] is actively aware of the litigation and is

1 following it, and (b) the defendant is attempting to obtain the domain name.”

2 4. As of the date of this filing, Pace has been unable to locate Lundh for potential service
3 in a jurisdiction other than Hong Kong, which he continues to hold out as his residence. Attached
4 as **Exhibit B** is a true and correct copy of Lundh's LinkedIn profile page which I accessed today
5 at the address indicated on the exhibit.

6 5. Lundh appears to routinely work with U.S.-based counsel to secure federal patent
7 and trademark registrations. For example, as recently as October 8, 2019, the U.S. Patent &
8 Trademark Office issued Patent No. 10,433,656 to Lundh. Attached as **Exhibit C** is a true and
9 correct copy of U.S. Pat. 10,433,656 to Lundh.

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11 I declare under penalty of perjury under the laws of the United States that to my knowledge
12 the foregoing is true and correct.

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14 || Executed on September 25, 2020

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s/ Derek Linke
Derek Linke

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DECL. OF D. LINKE IN SUPPORT OF
STATUS REPORT — 2
[Case No. 3:18-CV-05965-BHS]

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